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Attorneys for Debtors

In Re:

SONYA ROYSTER,

Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Case No. 19-28873 SLM

Chapter 13

OBJECTION TO APPLICATION FOR EARLY TERMINATION OF LOSS MITIGATION

1. I, Scott D. Sherman, am an attorney at law in the State of New Jersey and I am the attorney for the Debtor in the above case. I am filing this certification in support of Debtors' Early Termination of Loss Mitigation

2. These Debtors filed his bankruptcy case on 10/3/2019.

3. On 1/13/2022 a Loss Mitigation Order was entered which set a Loss Mitigation deadline of 4/13/2022.

4. Although Debtor's Chapter 13 plan is not premised on obtaining a loan modification for the property located at 380 Watsessing Avenue, Bloomfield, New Jersey 07003, Debtor wanted to make an application and attempt to secure a loan modification if possible.

5. My office started working with Debtor on her loan modification application on January 14, 2022, and on March 17, 2022, an application was submitted through the portal.

6. On March 18, 2022, we received acknowledgement through the portal that application was received and is under review.

7. There is no prejudice to the Mortgagor if the portal remained open through the

conclusion of the loss mitigation period set forth in this court's 1/13/2022 order.

8. We are requesting that Loss Mitigation be allowed to run through at least the end of the current period (4/13/2022).

WHEREFORE, it is respectfully requested that this HONORABLE COURT to Deny the Application for Early Termination of Loss Mitigation.

I hereby certify that the foregoing statements are true. I further certify that if any of the statements made by me are willfully false, I am subject to punishment.

Dated: 3/21/2022

MINION & SHERMAN

/s/ Scott D. Sherman, ESQ.

SCOTT D. SHERMAN, ESQ.
Attorney for the Debtor(s)